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14 Attorneys for Defendants

15 FIDELITY NATIONAL TITLE GROUP, INC., CHICAGO
16 TITLE INSURANCE COMPANY, and TICOR TITLE OF
17 NEVADA, INC.

18 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
19 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

20 Gary L. Compton, State Bar No. 1652
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22 Las Vegas, Nevada 89121

23 **UNITED STATES DISTRICT COURT**

24 **DISTRICT OF NEVADA**

25 DEUTSCHE BANK NATIONAL TRUST
26 COMPANY,

27 Plaintiff,

28 vs.

CHICAGO TITLE INSURANCE
COMPANY et al.,

Defendants.

Case No.: 2:21-CV-01854-GMN-DJA

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT (ECF No. 1)**

25 COMES NOW defendants Fidelity National Title Group, Inc. (“FNTG”), Chicago Title
26 Insurance Company (“Chicago Title”) and Ticor Title of Nevada, Inc. (“Ticor Agency”)
27 (collectively “Defendants”) and plaintiff Deutsche Bank National Trust Company (“Deutsche
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1 Bank”), by and through their respective attorneys of record, which hereby agree and stipulate as
2 follows:

3 1. On October 6, 2021 Deutsche Bank filed its complaint in the Eighth Judicial
4 District Court for the State of Nevada;
5 2. On October 6, 2021, Chicago Title removed the instant case to the United States
6 District Court for the State of Nevada (ECF No. 1);

7 3. Chicago Title’s and Ticor Agency’s respective responses to Deutsche Bank’s
8 complaint are currently due on January 24, 2022, while FNTG’s response is currently due on
9 January 25, 2022;

10 4. Counsel for Defendants request a 30-day extension for Chicago Title and Ticor
11 Agency (29 days for FNTG) through and including Wednesday, February 23, 2022, for
12 Defendants to file their respective responses to Deutsche Bank’s complaint to afford Defendants’
13 counsel additional time to review and respond to Deutsche Bank’s complaint.

14 5. Counsel for Deutsche Bank does not oppose the requested extension;

15 6. This is the first request for an extension made by counsel for Defendants, which is
16 made in good faith and not for the purposes of delay.

17 7. This stipulation is entered into without waiving any of Defendants’ objections
18 under Fed. R. Civ. P. 12.

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1 **IT IS SO STIPULATED** that Defendants' respective deadlines to respond to the
2 complaint are hereby extended through and including Wednesday, February 23, 2022.

3 Dated: January 19, 2022

SINCLAIR BRAUN LLP

5 By: /s/-Kevin S. Sinclair

6 KEVIN S. SINCLAIR
7 Attorneys for Defendants
8 FIDELITY NATIONAL TITLE GROUP,
INC., CHICAGO TITLE INSURANCE
COMPANY, and TICOR TITLE OF
NEVADA, INC.

9 Dated: January 19, 2022

WRIGHT FINLAY & ZAK, LLP

11 By: /s/-Lindsay D. Dragon

12 LINDSAY D. DRAGON
13 Attorneys for Plaintiff
14 DEUTSCHE BANK NATIONAL TRUST
COMPANY

15 **IT IS SO ORDERED.**

16 Dated this 20th day of January, 2022.

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18 DANIEL J. ALBREGTS
19 UNITED STATES MAGISTRATE JUDGE